

RECEIVED

20:2 FEB 24 PM 2:52

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHIS

Lourdes Gabikagojeaskoa

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

University of Memphis

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Lourdes Gabikagojeaskoa
(name of plaintiff)

is a citizen of the United States and resides at 99 North Main Street #1101
(street address)

Memphis U.S.A. TN
(city) (country) (state)

38103 901-521-1012
(zip code) (telephone number)

3. Defendant University of Memphis
(defendant's name)
 lives at, or its business is located at 341 Administration Bldg
(street address)
Memphis, TN 38152

4. Plaintiff sought employment from the defendant or was employed by the defendant at
341 Administration Bldg
(street address)
Memphis U.S.A TN 38152
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 30 5 2011
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about _____
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 9 12 2011
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 15 12 2011. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) ___ race, (2) ___ color, (3) ___ sex, (4) ___ religion, (5) ☒ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) _____

10. The circumstances under which defendant discriminated against plaintiff were as follows: I was denied tenure,

I Appeal the decision, and the
Appeal was in my favor.

Final decision → My contract is going to
finish ~~when~~ in the final of 2011-2012
academic year.

11. The acts set forth in paragraph 9 of this complaint

- (a) / are still being committed by defendant.
(b) are no longer being committed by defendant.
(c) may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) Defendant be directed to employ plaintiff, or
(b) Defendant be directed to re-employ plaintiff, or
(c) Defendant be directed to promote plaintiff, or;
(d) Defendant be directed to re-employ and promote
plaintiff

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (/) No ()



SIGNATURE OF PLAINTIFF